

## Colorado Extreme Flood Events of September 2013

### **Guidance for Sediment and Debris Clean-Up, Emergency Construction Activities, and Dewatering**

The Water Quality Control Division (Division) prepared this guidance to address the large scale issues of sediment and debris accumulation, retained water, and flood-related construction activities associated with the September 2013 flood events. The Division selected this information format as it is not practical for all operators to seek, or for the Division to provide, case-specific guidance in a timely manner at this time.

This guidance only addresses sediment and debris clean-up and emergency construction activities. For other issues, such as upsets associated with domestic WWTFS/collection systems and process waters for industrial operations, operators are encouraged to contact the Division directly. The Colorado Environmental Release and Incident Reporting Line is 1-877-518-5608.

Additional Colorado Department of Public Health and Environment guidance regarding flood related issues is available on the flood resource page at [CDPHE Flood Guidance Page](#).

Please remember that safety comes first! Avoid coming into contact with flood waters as they may contain pollutants such as raw sewage. Even areas that are no longer under water have the potential to contain various pollutants. Use caution when you are out in the field and/or are exposed to flood waters.

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The Division provides the following guidance to help ensure that safety and public health needs are met, and further impacts to water quality are minimized.

#### **1. Cleanup at sites with permits for stormwater discharges (including construction and industrial activity):**

Remember - Safety first! Then return to compliance as quickly as feasible. Returning to compliance may include prioritizing clean-up and repairing/replacing stormwater controls prior to returning to normal operations, especially at construction sites. For example, prior to resuming construction activities, the expectation is that stormwater management system controls are restored as originally designed, or revised to meet the new conditions. The Division acknowledges that the return to compliance will take time, and may be hampered by wet site conditions that do not allow access. If stormwater controls failed and resulted in discharges of uncontrolled pollutants, permittees should submit noncompliance notifications and may claim upset in accordance with the permit. Noncompliance notification should occur as soon as practicable, and while timely communication of permit compliance issues remains very important, the Division understands that permittees may not be able to meet the specific deadlines in the permit due to prevailing site conditions. Noncompliance notification to meet the oral notification requirements in stormwater discharge permits may be done by email for this event by sending the required information to [cdphe.wqstorm@state.co.us](mailto:cdphe.wqstorm@state.co.us)

#### **2. Cleanup of general areas (e.g., streets, flooded building, etc.):**

The Divisions expects that sediment and debris is cleaned-up using “dry” removal methods, to the extent possible. These materials should be handled and stored in a manner that prevents releases to storm drains, streams, ditches, and other surface waters. Waste should be stored in upland areas away from concentrated stormwater flows, and in a manner that prevents erosion and transport of materials.

The Division understands that prioritizing public and worker safety may result in some unavoidable discharges of pollutants, including removing residual sediment by washing to quickly address safety concerns. In such cases,

inlet protection or similar sediment control methods should be implemented to the extent feasible to minimize further transport of pollutants to waterways.

For urban areas where a government entity holds an MS4 permit, cleanup activities may be covered by the MS4 permit. Where safety and health circumstances necessitate practices that may result in noncompliance with the MS4 permit, the permittee should submit noncompliance notifications and may claim upset in accordance with the permit. Noncompliance notification should occur as soon as practicable, and while timely communication of permit compliance issues remains very important, the Division understands that permittees may not be able to meet the specific deadlines in the permit due to conditions associated with this event. Noncompliance notification to meet the oral notification requirements in MS4 permits may be done by email for this event by sending the required information to [cdphe.wqstorm@state.co.us](mailto:cdphe.wqstorm@state.co.us)

### **3. Regarding Pumping of Water:**

If pumping stormwater collected in excavations, sediment basins, and other impoundments which are not draining, the Division expects BMPs (e.g., top skimmers, filter bags, etc) to be implemented to the extent possible to minimize sediment loading to water bodies.

If pumping occurs at a site that holds any type of stormwater discharge permit (construction, industrial, municipal), document the activity and associated BMPs in the stormwater management plan as soon as possible.

If pumping occurs at a site with a dewatering permit (indicating groundwater is also present), permittees should implement controls to the extent possible, and monitor the discharge in accordance with the permit.

### **4. Contaminated Water**

If there is potential for additional pollutants to be located in the area, such as spills from tanks or processing areas, please be aware that discharges of such pollutants may cause problems to downstream uses of state waters, including additional safety and health concerns. If possible, avoid discharging contaminated water to water ways without coordinating with the Division first. Please contact the Colorado Environmental Release and Incident Reporting Line 1-877-518-5608 for additional case-by-case guidance.

### **5. Construction Activities**

There will be a great deal of construction that is required in response to flooding in the state. When construction activities require a discharge permit from the Division (e.g., construction stormwater or construction dewatering permit coverage), the normal permitting process should be followed, when possible, to help minimize further impacts to water bodies. However, if expedited construction is necessary to address concerns for health or safety concerns, the Division understands that such activities may need to occur prior to obtaining appropriate discharge permits. In such cases, permits should be obtained as soon as practicable, and notification provided with the application that activity began without the required permit(s). If activities are completed prior to obtaining permit coverage, the Division should be notified.

The Division acknowledges that fully implementing practices to control the discharge of pollutants associated with these emergency activities may be hampered by site conditions, including wet site conditions that do not allow access. The Division's expectation is that controls are implemented as soon as it is feasible and safe to do so.